

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION
No. 7:23-CV-897**

IN RE:)
)
CAMP LEJEUNE WATER LITIGATION) **JOINT MOTION TO AMEND STIPULATED**
) **PROTECTIVE ORDER**
) **(CASE MANAGEMENT ORDER NO. 13)**
This Document Relates To:)
ALL CASES)
)

The Plaintiffs' Leadership Group (the "PLG") and Defendant United States (together, the "Parties") jointly file this motion to amend the Parties' Stipulated Protective Order – Case Management Order No. 6 [D.E. 36]. The proposed Amended Stipulated Protective Order would expand access to certain data so that counsel representing claimants with administrative Camp Lejeune Justice Act ("CLJA") claims ("Claimants' Counsel")—and not only counsel representing Plaintiffs with CLJA cases pending before this Court—can access the data for use in the Department of the Navy's administrative claim process ("administrative claim process"). In particular, the Amended Stipulated Protective Order would allow Claimants' Counsel to access the Defense Manpower Data Center ("DMDC") data (specifically, CLJA_ATSDRSUPP-0000000105, CLJA_ATSDRSUPP-0000000106, CLJA_ATSDRSUPP-0000000107, CLJA_ATSDRSUPP-0000000108, and CLJA_ATSDRSUPP-0000000110 (produced natively in Microsoft Excel)).

The PLG has requested that Defendant grant Claimants' Counsel access to additional data, beyond the access granted by the proposed Amended Stipulated Protective Order. The United States has represented to the PLG that it is seeking the relevant permissions to grant

access to this additional data to be used by claimant's counsel in the administrative claim process. In the interest of time, the Parties agreed to file this joint motion. Should those approvals not materialize by June 26, 2024, the PLG intends to file a motion with this Court for such expanded access.

DATED this 22nd day of June 2024.

Respectfully submitted,

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